

RECEIVED FEDERAL ELECTION COMMISSION

2014 OCT 27 PM 3: 06

OFFICE OF GENERAL COUNSEL

Frankic Hampton
Federal Election Commission
Office of the General Counsel
999 E St. NW
Washington, D.C. 20463

RE: MUR 6862

Dear Ms. Hampton,

Please find enclosed Complaint 6862, originally filed on August 16, 2014. Per your instructions I have signed the enclosed and had the document notarized.

If your office should require additional documentation to accompany the enclosed, please do not hesitate to reach out to myself. Thank you for reaching out so we may correct this matter.

Sincerely,

Emily Cornell

Executive Director Keep Louisiana Working

Enclosure:

FEC complaint 6862



4845 Jamestown Ave. Suite 208 Baton Rouge, LA 70808 Office: (225) 341-1709 www.KeepLouisianaWorking.com

August 14, 2014

Office of the General Counsel Federal Election Commission 999 E Street NW Washington, D.C. 20463

Re: Complaint Against U.S. Senator Mary Landrieu and Friends of Mary Landrieu

To Whom It May Concern:

This letter serves as a formal complaint that U.S. Senator Mary Landrieu and her political committee, Friends of Mary Landrieu, have violated federal law. The following is based on information and belief from media reports, unless otherwise noted.

1. On August 12, 2014, the Friends of Mary Landrieu publicly acknowledged that on at least one occasion, on November 8, 2013, U.S. government funds were used to pay for political and fundraising activities that benefited her recampaign for the U.S. Senate. See attached CNN report. Specifically, the Office of Senator Mary Landrieu expended \$3,224.08 for a November 8, 2013 charter flight from New Orleans, Louisiana to Lake Charles, Louisiana for the purpose of transporting Senator Landrieu to a campaign fundraising event.

- The fundraising event in Lake Charles, Louisiana was titled a "Women's
 Luncheon to re-elect U.S. Senator Mary Landrieu" and photos of the Senator
 greeting supporters at the event were posted on Twitter by the Friends of
 Mary Landrieu. See attached image of invitation and photo of Senator
 Landrieu.
- 3. The use of government funds by Senator Landrieu to further campaign or political activities is a violation of federal law. Federal government monies and resources may be used for official purposes only. See 31 U.S.C. § 1301(a) and Senate Ethics Manual, 2003 Edition, Page 146.
- 4. The failure of the Friends of Mary Landrieu to pay for and report the \$3,224.08 expenditure for air transportation to a campaign fundraising event is a violation of federal law. See Z U.S.C. 432(e) and Z U.S.C. § 434(b), Expenditures made to promote Senator Landrieu's candidacy must be paid for with campaign funds and reported to the Federal Elections Commission ("F.E.C").
- 5. According to the Friends of Mary Landrieu, the luncheon fundraising event was the Senator's sole purpose for her air travel from New Orleans to Lake Charles on November 8, 2013. According to the Office of Senator Mary Landrieu, the fundraising event prevented her from accompanying President Obama during his visit to New Orleans at ay time on November 8, 2013. See attached *Talking Points Memo* article.
- 6. The violations of federal law by Senator Landrieu and the Friends of Senator Landrieu came to light as a result of a July 31, 2014 IISA Today article documenting \$47,000 of U.S. government funds spent by Senator Landrieu on charter flights. See attached IISA Today report. Four days following the article's publication and nearly nine months after the Senator's charter flight, the Friends of Mary Landrieu finally agreed to reimburse the federal government \$3,224.08 for the Lake Charles trip.
- 7. Senator Landrieu's travel was not "mixed purpose" travel designed to transport her to events related to her campaign for re-election as well as to events related her official duties as a U.S. Senator. Accordingly, payment for

the charter flight with U.S. government funds is prohibited and Senator Landrieu and the Friends of Mary Landrieu remain in violation federal law and F.E.C. regulations despite reimbursement of the government for the prohibited \$3,224.08 political expenditure nine months after it occurred:

See 11 C.F.R. § 106.3 and Senate Ethics Manual, 2003 Edition, Page 119.

Based on the forgoing and the admission by the Friends of Mary Landrieu that U.S. government monies were used to pay for political campaign activities, I respectfully request that the F.E.C. take enforcement action against Senator Landrieu and her campaign committee to ensure that taxpayer resources are not used for political gain in violation of federal law.

Sincerely,

Emily Cornell

Emily@KeepLouisianaWorking.com

En Aul

Sworn to and subscribed before notary public commissioned and qualified in the State of Louisiana, on the 22nd day of October 2014.

11965669.1

Kathryn E. Belanger Notary Public Bar Roll #30591 State of Louisiana My Commission is for Life